

# **EXHIBIT A**

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

---

OWLET BABY CARE, INC.,

Petitioner,

vs.

MASIMO CORPORATION and CERCACOR  
LABORATORIES, INC.

Respondents.

**DECLARATION OF JACOB BRIEM IN  
SUPPORT OF MOTION TO REOPEN  
CASE AND RECONSIDER ORDER  
DENYING MOTION TO QUASH**

Case No. 2:21-mc-00096-TS

I, Jacob Briem, hereby declare and state as follows:

1. I am over the age of eighteen and am competent to make the following statements based upon my personal knowledge.
2. I am an attorney licensed to practice law in the State of Utah. I currently serve as General Counsel for Owlet Baby Care, Inc. (“Owlet”).
3. Owlet is a Delaware corporation with its principal place of business at 2500 Executive Pkwy, Lehi, Utah 84043.
4. Owlet’s sole physical office is at 2500 Executive Pkwy, Lehi, Utah 84043.
5. Owlet does not have a physical office or location in California or anywhere else outside of Utah.
6. I understand that Masimo Corporation and Cercacor Laboratories, Inc. (“Masimo”), in connection with their Opposition to Owlet’s Motion to Reopen Case and Reconsider the Order Denying Owlet’s Motion to Quash Without Prejudice, have submitted the

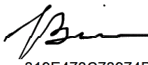
Linkedin profile of Sarah Sang as evidence that Owlet regularly transacts business in person within 100 miles of the Central District of California.

7. Sarah Sang is employed by Owlet. She was hired on January 11, 2021 as a Product Manager. Sarah manages an internal Owlet team that develops Owlet products. She does not represent Owlet publicly in any capacity. She is a mid-level employee with no customer interaction.

8. Sarah does happen to live in California. Her place of residence, however, is irrelevant to her job at Owlet and she performs her job functions remotely. She does not work at a physical Owlet office, as Owlet does not have a physical office in California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 26th day of March, 2021

DocuSigned by:  
  
319E473C73974DA...  
\_\_\_\_\_  
Jacob Briem